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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

November 18, 1994

OUR FILE NO.
0010-217-63

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

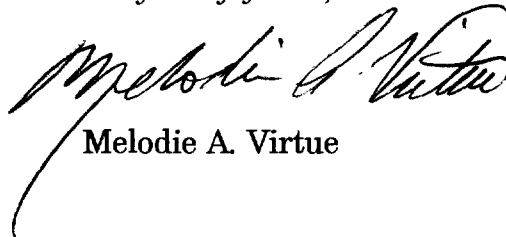
RE: MM Docket No. 94-101
RM-8510
FM Table of Allotments
Kerman, California

Dear Mr. Caton:

Transmitted herewith, on behalf of EBE Communications Limited Partnership, is an originally executed copy of the Statement of William F. Hammett, Consulting Engineer, to be associated with its **COMMENTS AND COUNTERPROPOSAL** filed on November 14, 1994, in the above-referenced rulemaking proceeding.

Should further information be desired, kindly communicate directly with this office.

Very truly yours,



Melodie A. Virtue

Enclosures (5)
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**Statement of William F. Hammett, Consulting Engineer**

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by EBE Communications, L.P., licensee of FM Station KNAX, Channel 250B, Fresno, California, to prepare this Engineering Exhibit in support of a petition to allot Channel 237A at Kerman, California.

Background

FM Station KNAX has served Fresno, California, and the surrounding communities since 1948. In 1989, the station was required to vacate its long-time site on top of the Fresno *Bee* building in downtown Fresno and chose at that time to relocate the transmitting facilities to the Meadow Lakes antenna farm, 49 kilometers northeast of Fresno. From that location, service into Fresno has proved to be marginal, and KNAX seeks to relocate again to a site closer to the city of license. The recent proposal to add Channel 252A to Kerman, California, was made possible by the move of KNAX to a location so far from Fresno, and that allotment of Channel 252A to Kerman would effectively preclude KNAX from ever regaining its lost service.

Proposed Conditions

Therefore, Channel 237A has been identified as an alternate channel for serving the community of Kerman. A site restriction of 11 kilometers west-southwest would be required, in order to protect existing allotments; however, this does not prevent such a new station from serving Kerman, as the principal community contour for Class A stations extends a distance of 16 kilometers. The proposed reference coordinates for the Channel 237A allotment at Kerman are 36° 41' 00" N 120° 10' 48" W (NAD27), at which location the spacing requirements in §73.207 of the FCC Rules are met to all existing stations, permits, allotments, and proposals, as shown below:

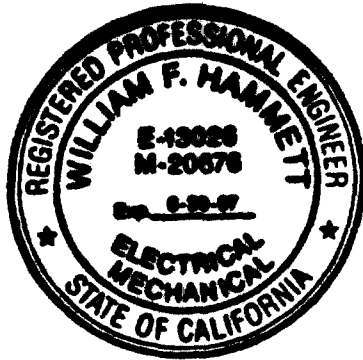
<u>Channel</u>	<u>Nearest Station</u>	<u>FCC Required Distance</u>	<u>Distance from Proposal</u>
234A	Vacant, Firebaugh, CA	31 kilometers	31 kilometers
235B	KBOS-FM, Tulare, CA	69	111
236B	KDJK, Oakdale, CA	113	127
237B1	KLLY, Oildale, CA	143	171
238A	KBOQ, Carmel, CA	72	145
239B	KJFX, Fresno, CA	69	69
240A	KNTD, Livingston, CA	31	85
290B	KKDJ, Fresno, CA	15	80
291A	Proposal, San Lucas, CA	10	97



New FM Station • 95.3 MHz, Channel 237A • Kerman, California

Conclusion

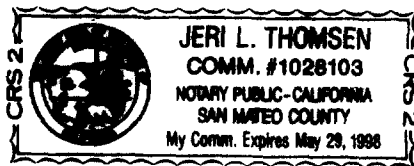
The counterproposal to allot Channel 237A to Kerman, California, as its second local aural service will allow the needs of that community to be fully met while also allowing FM Station KNAX to better serve Fresno, its city of license.



A handwritten signature of William F. Hammett in black ink.

William F. Hammett, P.E.

Subscribed and sworn to before me this 11th day of November, 1994



A handwritten signature of Jeri L. Thomsen in black ink.



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

Comparative Coverage:
Owens Mountain vs. Meadow Lakes

Owens Mountain (Ksxy site)

Database: 1990 census, rev. 920714

Coordinates: N. Lat. 36 55 48
W. Long. 119 38 27

State County	70 dBu	60 dBu
<hr/>		
California		
Fresno County	526,279	622,496
Kings County		965
Madera County	25,255	74,158
Mariposa County		79
Merced County		39
Tulare County		34,599
	<hr/>	<hr/>
	551,534	732,336
	+267%	+9%
Area covered, km ²	3,432	8,606
	+8%	+7%

popct v1.10

Meadow Lakes (existing site)

Database: 1990 census, rev. 920714

Coordinates: N. Lat. 37 04 29
W. Long. 119 25 52

State County	70 dBu	60 dBu
<hr/>		
California		
Fresno County	132,123	590,203
Kings County		
Madera County	18,264	73,003
Mariposa County		4,429
Merced County		12
Tulare County		5,778
	<hr/>	<hr/>
	150,387	673,425
Area covered, km ²	3,178	8,062

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered to the following:

Mr. Joe S. Mauk
Valley Center Broadcasting
365 West Menlo Avenue
Fresno, CA 93704

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau, Room 8322
2025 M Street, NW
Washington, DC 20554


Barbara L. Rascon

November 18, 1994